

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JEREMY R. WILSON,

Plaintiff,

v.

CERTAIN UNDERWRITERS AT LLOYD’S
OF LONDON SUBSCRIBING TO POLICY
2623TDUBMDJ18L3803, RHCOWBOYS
TRUCKING, LLC, AND BEFEKADU M.
TSEGAYE,

Defendants.

CERTAIN UNDERWRITERS AT LLOYD’S
OF LONDON SUBSCRIBING TO POLICY
2623TDUBMDJ18L3803,

Counterclaim Plaintiff,

v.

JEREMY R. WILSON,

Counterclaim Defendant.

CERTAIN UNDERWRITERS AT LLOYD’S
OF LONDON SUBSCRIBING TO POLICY
2623TDUBMDJ18L3803,

Crossclaim Plaintiff,

v.

RHCOWBOYS TRUCKING, LLC, AND
BEFEKADU M. TSEGAYE,

Crossclaim Defendants.

Case No. 21-768-NJR

Chief Judge Nancy J. Rosenstengel

JOINT MOTION TO REMAND

NOW COMES Defendant Certain Underwriters at Lloyds of London Subscribing to Policy 2623TDUBMDJ18L3803 (“Underwriters), by and through its undersigned counsel, SmithAmundsen LLC, and Plaintiff Jeremy R. Wilson (“Wilson”), by and through his

undersigned counsel, Hassakis & Hassakis, P.C., and for their Joint Motion to Remand state as follows:

1. On May 18, 2021 Plaintiff, Wilson, filed his Complaint for Declaratory Judgment (“Complaint”) in the Effingham County, Fourth Judicial Circuit of Illinois.

2. Summons and Service of said Complaint for Declaratory Judgment was affected upon Defendant, Underwriters, on June 3, 2021.

3. On July 2, 2021, Defendant Underwriters filed its Notice of Removal and thereby removed this matter from Effingham County Circuit Court to the United States District Court for the Southern District of Illinois. (Doc. 1.)

4. On July 8, 2021, counsel for Plaintiff filed his appearance (Doc. 5) and Plaintiff filed its Motion to Remand. (Doc. 6.)

5. On July 23, 2021, Underwriters filed its Answer and Separate Defenses to Plaintiff’s Complaint (Doc. 14) and its Counterclaim and Crossclaim for Declaratory Judgment (“Crossclaim”). (Doc. 15.)

6. Underwriters believes there is complete diversity satisfying subject matter jurisdiction; however, due to factors including the cost, international client representatives, and the existence of over 1,600 members comprising one of the subject syndicates, Underwriters and Wilson have agreed to jointly seek remand of this action to Effingham County, Fourth Judicial Circuit of Illinois.

7. This motion is brought pursuant to an agreement between Underwriters and Wilson, and the undersigned counsel represent that this motion is not interposed for any improper purpose.

WHEREFORE, for the reasons set forth above, Certain Underwriters at Lloyd’s of London Subscribing to Policy 2623TDUBMDJ18L3803 and Jeremy R. Wilson respectfully


request that the Court enter an order remanding this action to Effingham County, Fourth Judicial Circuit of Illinois.

Respectfully submitted by:

HASSAKIS & HASSAKIS, P.C.

SMITHAMUNDSEN LLC

By: /s/ Joshua A. Humbrecht (with consent)
Joshua A. Humbrecht, ARDC #6300072
One of the Attorneys for Jeremy R.
Wilson

By: 
Britta A. Sahlstrom, ARDC #6318035
One of the Attorneys for Certain
Underwriters at Lloyds of London
Subscribing to Policy
2623TDUBMDJ18L3803

Document Prepared by:

Christine V. Anto (ARDC # 6276102)
Britta A. Sahlstrom (ARDC # 6318035)
SmithAmundsen LLC
150 N. Michigan Avenue, Suite 3300
Chicago, Illinois 60601
(312) 894-3200
(312) 894-3210 – Fax
canto@salawus.com
bsahlstrom@salawus.com

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2021, a copy of the foregoing, **JOINT MOTION TO REMAND**, was filed electronically and served by mail to anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic service. Parties may access this filing through the Court's CM/ECF System.

/s/ Jacqueline Y. Smith